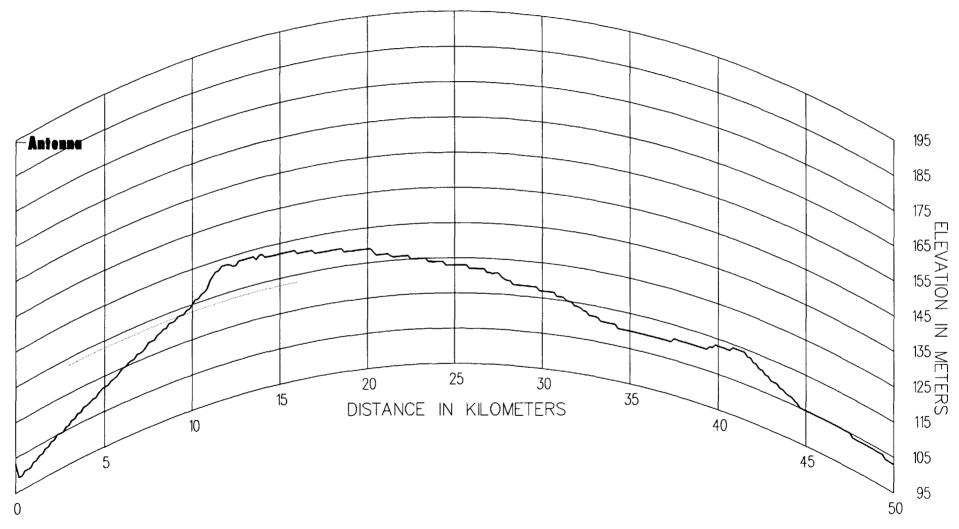
Average Radial Elevation 122.93 Meters AMSL Antenna Radiation Center 194.50 Meters AMSL

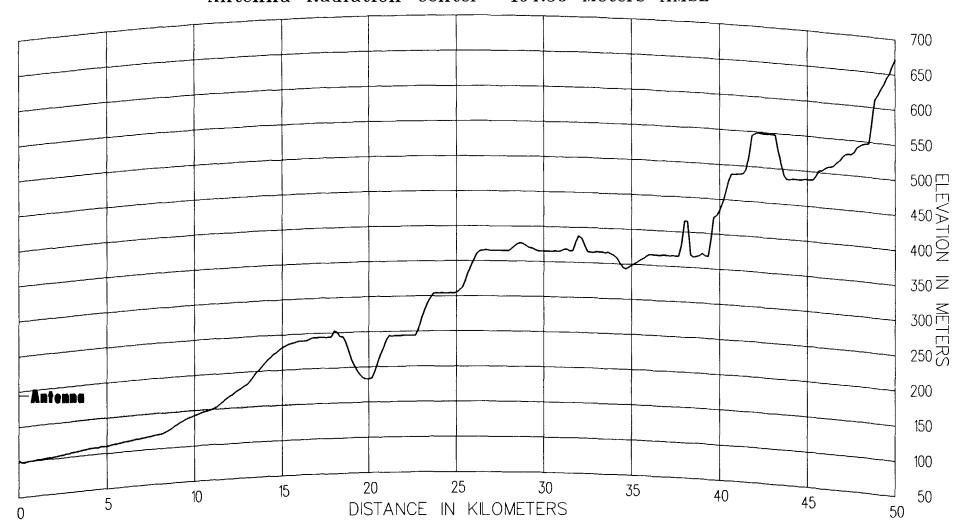


N 0.0 E Radial EXHIBIT E-6A SHEPHERD COMMUNICATIONS, INC.



Average Radial Elevation
Antenna Radiation Center

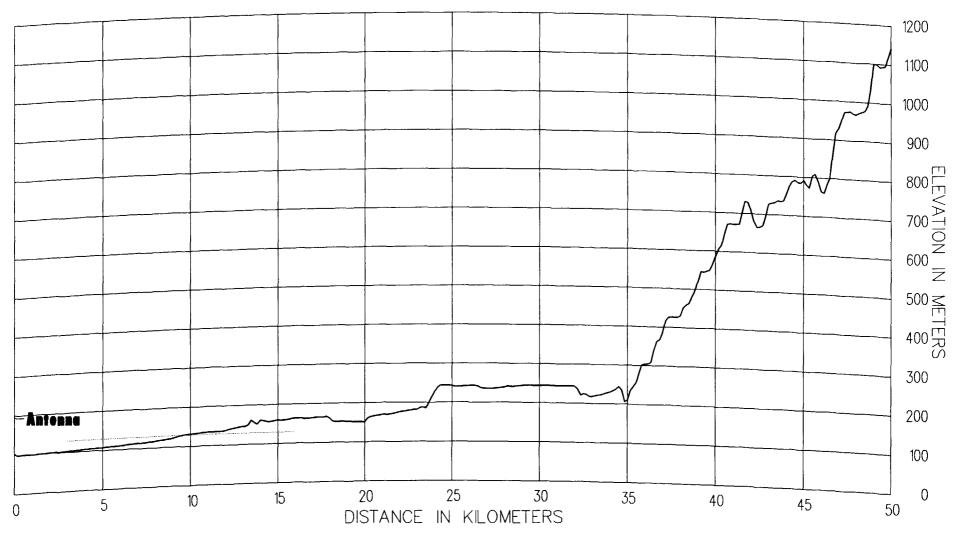
150.94 Meters AMSL 194.50 Meters AMSL



N 45.0 E Radial EXHIBIT E-6B SHEPHERD COMMUNICATIONS, INC.



Average Radial Elevation 128.91 Meters AMSL Antenna Radiation Center 194.50 Meters AMSL



N 90.0 E Radial EXHIBIT E-6C SHEPHERD COMMUNICATIONS, INC.



Average Radial Elevation Antenna Radiation Center 194.50 Meters AMSL

112.50 Meters AMSL

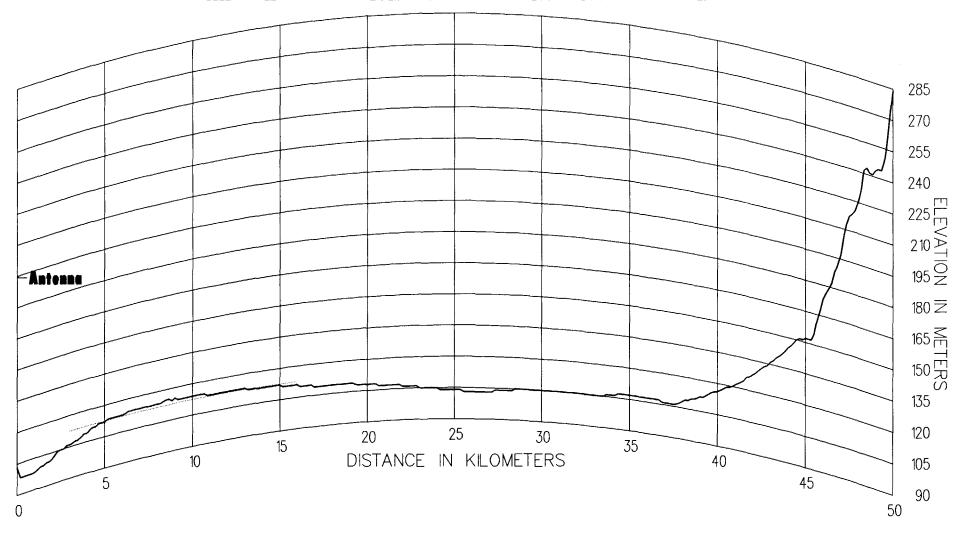
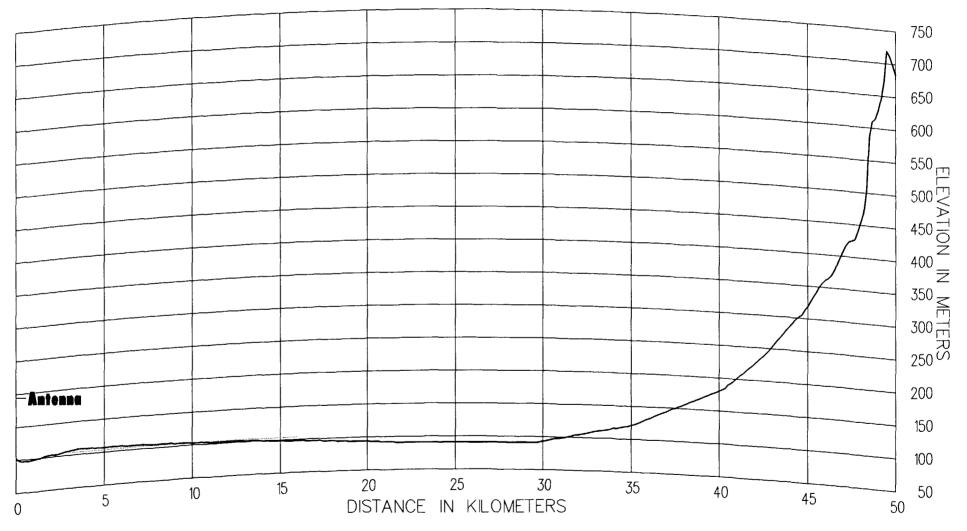


EXHIBIT E-6D N 135.0 E Radial SHEPHERD COMMUNICATIONS, INC.



Average Radial Elevation 103.67 Meters AMSL Antenna Radiation Center 194.50 Meters AMSL

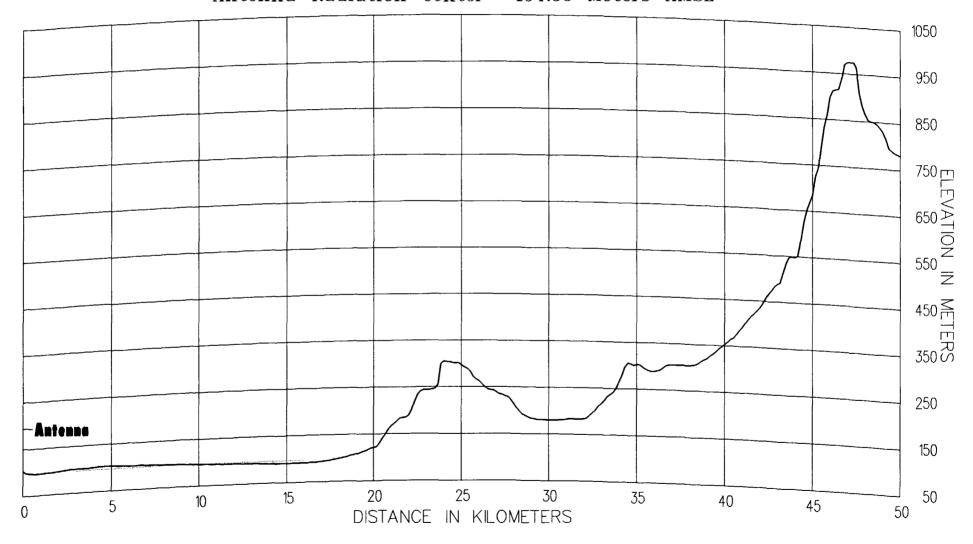


N 180.0 E Radial SHEPHERD COMMUNICATIONS, INC.



Average Radial Elevation
Antenna Radiation Center

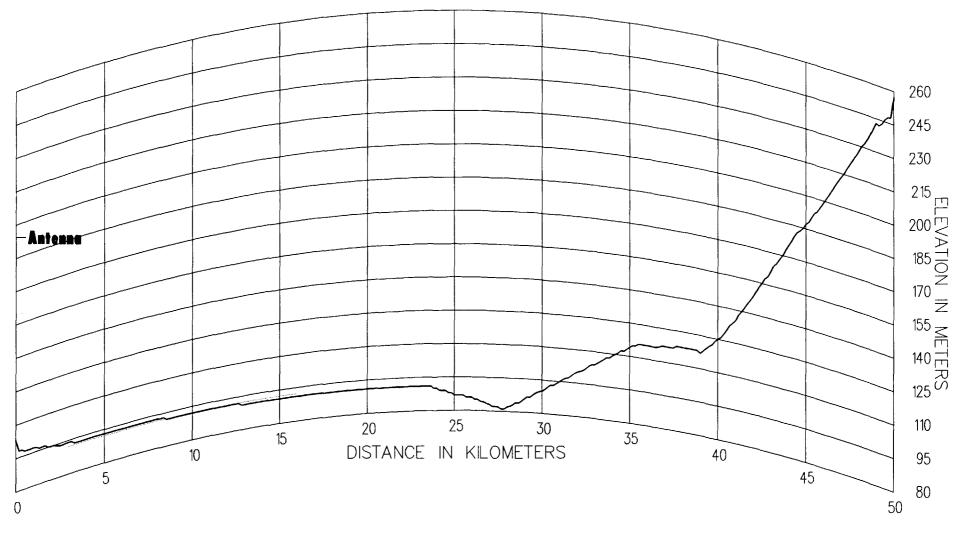
96.92 Meters AMSL 194.50 Meters AMSL



N 225.0 E Radial EXHIBIT E-6F SHEPHERD COMMUNICATIONS, INC.



Average Radial Elevation 92.22 Meters AMSL Antenna Radiation Center 194.50 Meters AMSL

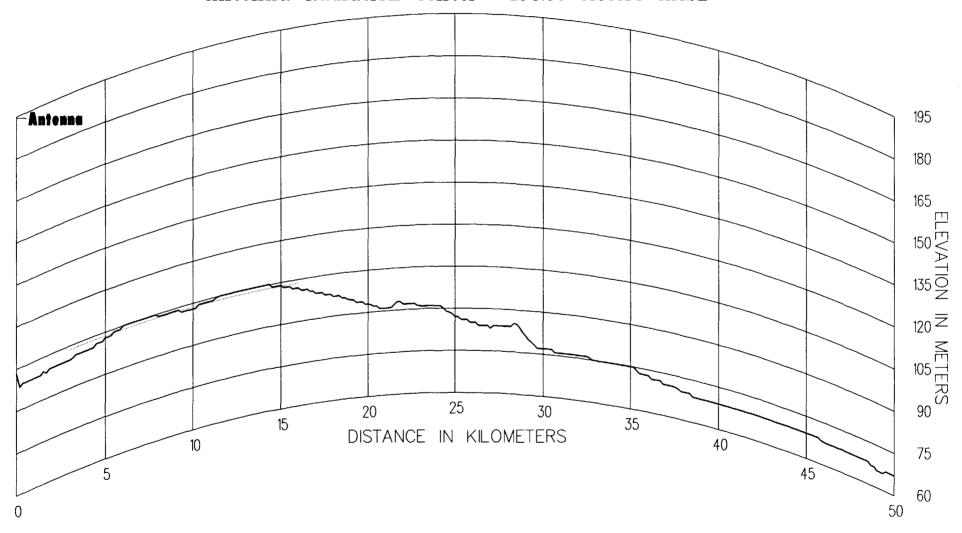


N 270.0 E Radial **EXHIBIT E-6G** SHEPHERD COMMUNICATIONS, INC.



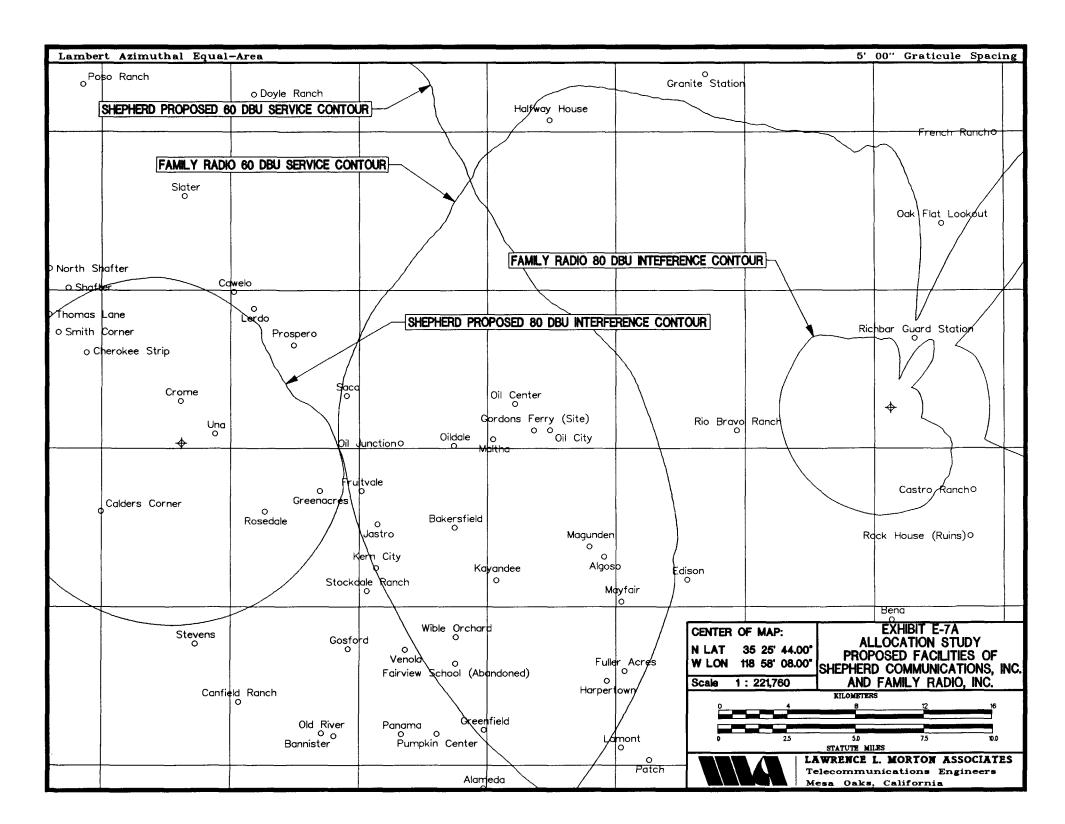
Average Radial Elevation
Antenna Radiation Center

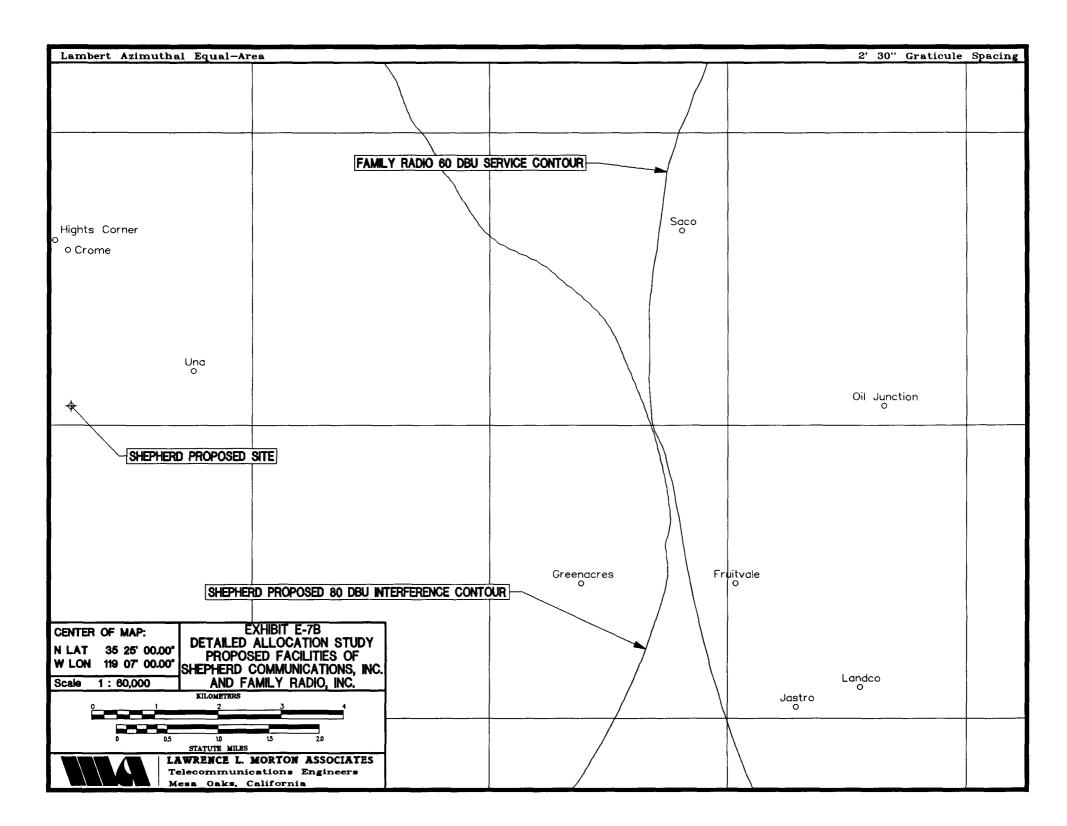
103.68 Meters AMSL 194.50 Meters AMSL

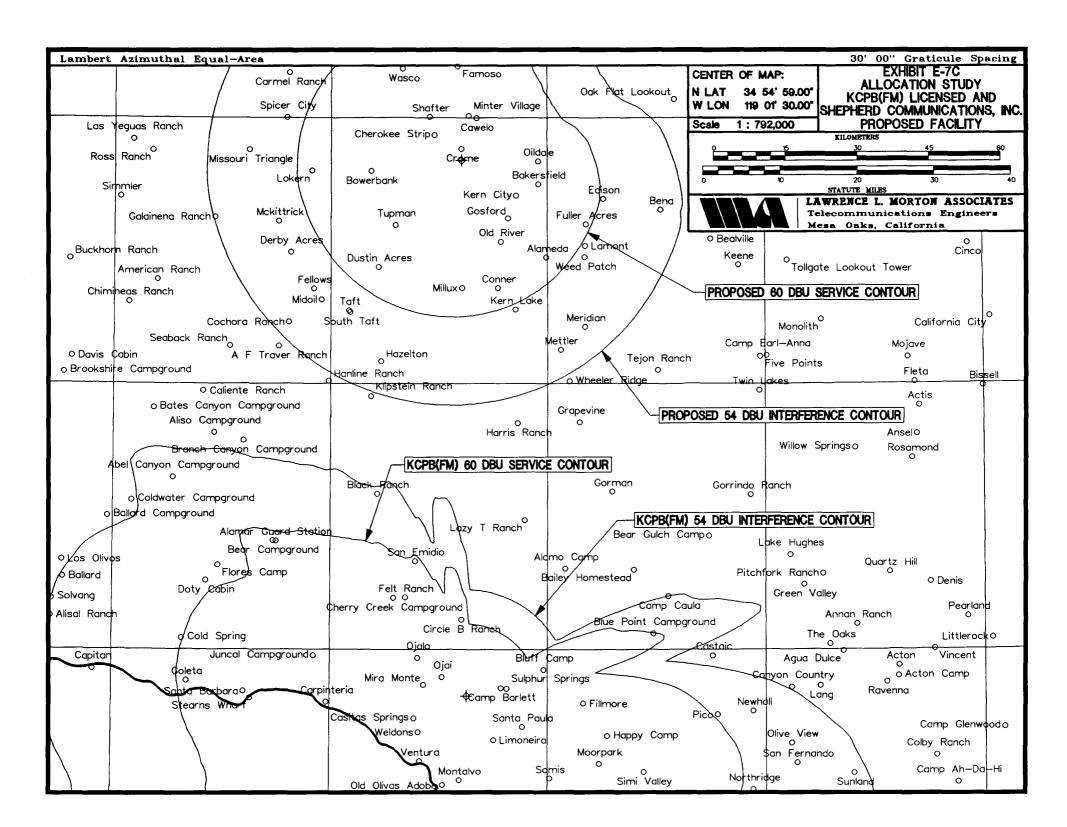


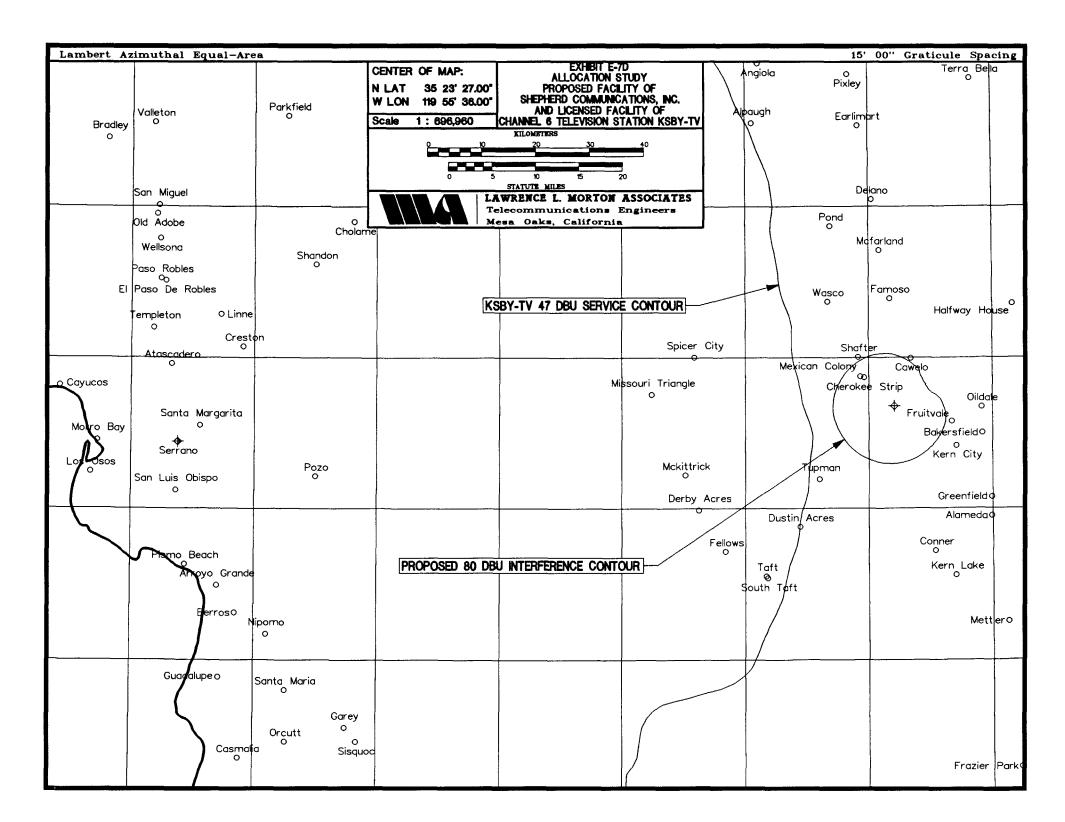
N 315.0 E Radial **EXHIBIT E-6H** SHEPHERD COMMUNICATIONS, INC.











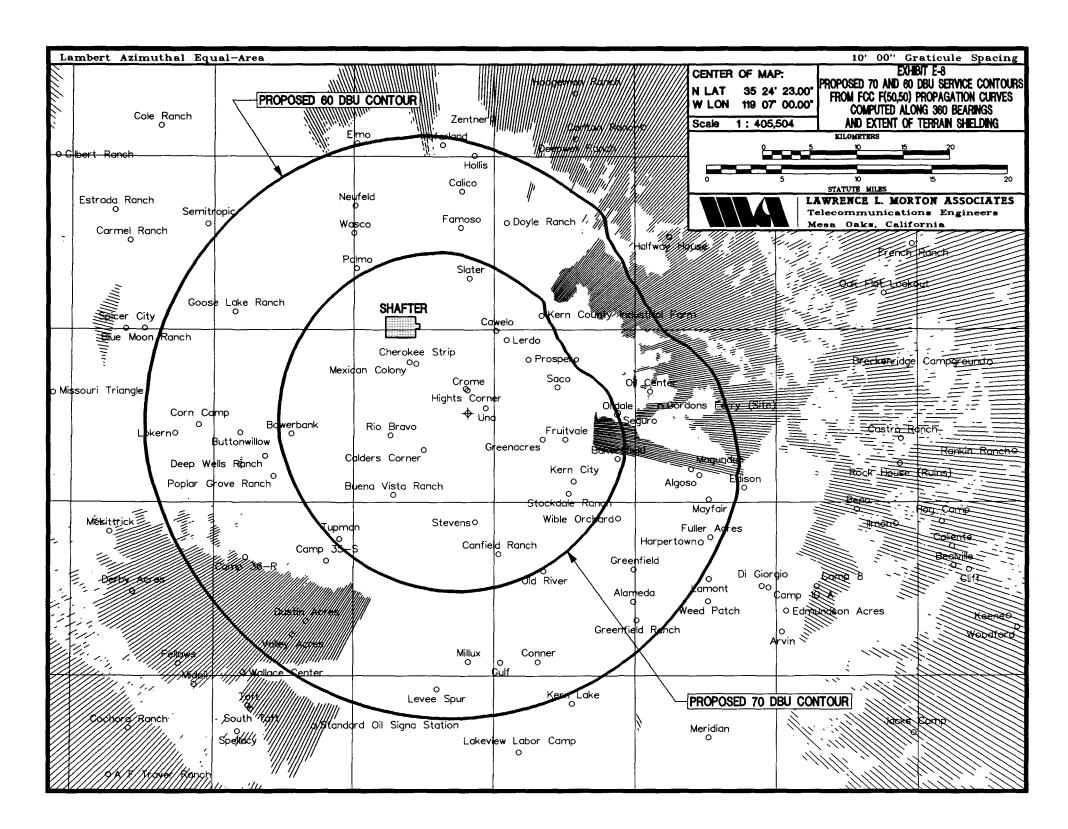


EXHIBIT E-9 ENVIRONMENTAL CONSIDERATIONS

I. DISCUSSION

The applicant, Shepherd Communications, Inc., has obtained permission to situate its FM broadcast antenna on the existing tower of station KKBB(FM). The KKBB(FM) supporting structure is located 2.47 kilometers (1.53 miles) south of the center of Crome, and 11.15 kilometers (6.93 miles) southeast of the center of Shafter, California. The ground elevation of the site is 103.3 meters (339 feet) above mean sea level.

The tower consists of a 115.1 meter (377.6 feet) guyed, uniform cross-sectional steel tower supporting the existing antenna of KKBB(FM), BLH-890830KA. The overall height of the supporting structure is 116.0 meters (380.6 feet) including top-mounted lighting beacon. The KKBB(FM) two-bay antenna is located 110.9 meters (364 feet) above ground. The proposed antenna will be located 91.1 meters (299 feet) above ground. The transmitting equipment will be housed in the KKBB(FM) existing transmitter building located near the base of the tower.

II. NON-IONIZING RF RADIATION

In accordance with the requirements of the FCC Public Notice dated November 14, 1985, entitled Environmental Processing Rules For Broadcasting, the worst-case power density in mW/cm² has been calculated using equation four of Section II of the Office of Science & Technology Bulletin No. 65 entitled, Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation. Equation four has been reduced so the constant reflects both the factor 1.64 used to obtain ERP relative to EIRP and the factor 1000 for the number of milliwatts/watt. Further consideration includes the Environmental Protection Agency (EPA) recommendation that a more realistic approximation should include ground reflection by assuming a maximum 1.6-fold increase in field strength or an increase in power density of 1.6² (2.56).

Therefore,

```
S_{mW/cm^2} = \frac{0.10496 \cdot (ERP_h + ERP_v)}{\pi \cdot R^2}
S_{mW/cm^2} = \frac{0.10496 \cdot (27000)}{\pi \cdot 91.1^2}
S_{mW/cm^2} = 0.109 \text{ mW/cm}^2 \quad (109 \text{ } \mu\text{W/cm}^2)
S_{mW/cm^2} = Power Density in milliwatts/centimeter^2
ERP_h = 13,500 \text{ watts max, horizontally-polarized ERP}
ERP_v = 13,500 \text{ watts max, vertically-polarized ERP}
R = 91.1 \text{ meters from antenna radiation center to tower base}
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The American National Standards Institute (ANSI) has established a maximum power density exposure limit of 1.0 mW/cm² averaged over any six-minute period, for radio frequency radiation in the band from 30 to 300 Megahertz.

In the aforementioned report, reference is made to studies conducted by the EPA in which a mathematical model of antenna behavior was developed to predict the required distance from the antenna radiation center to the bottom of the antenna supporting structure so the ANSI limit will not be exceeded anywhere on the ground. By interpolation of tabulated values in appendix B, table 1 of the report, it was determined that a maximum worst-case distance of 30.0 meters would be required assuming a single dipole element with an effective radiated power of 27.0 kilowatts (the sum of horizontally and vertically polarized power).

Figure 2 graphically represents the predicted power density two meters above ground as a function of horizontal distance from the base of the KKBB(FM) tower, based on the proposed operation acting alone. The figure shows that the proposed facility will produce a worst-case power density that is well below the standard.

In addition to the licensed facility of KKBB(FM), KKBB(FM) has a pending application, BPH-910409IC, to increase its effective radiated power from 3 kW to 6 kW. Furthermore, KXHA(FM) has an outstanding construction permit to operate with an ERP of 3 kW from the same tower, and has filed an application to increase its power to 6 kW. Since these pending facilities will eventually be in use from the same tower, the effects of nonionizing radiation produced by these proposed facilities also have been taken into account in the determination of compliance with the nonionizing radiation environmental protection rules.

The nonionizing radiation from the KKBB(FM) 6 kW and the KXHA(FM) 6 kW proposed operations were computed and added to the contribution from the proposed Shepherd Communications operation. Figure 1 illustrates the combined power density produced by all three stations in μ W/cm². In no case does the total radiation from the three stations exceed the acceptable limits near the ground about the tower. The effective radiated power of KKBB(FM) was doubled to account for circularly-polarized radiation as was the power of the KXHA(FM) proposal. The vertical radiation characteristics of the KKBB(FM) λ -spaced two-bay antenna, the KXHA(FM) one-bay antenna and the proposed four-bay antenna, were used to produce the graph of figure 1.

Protection to station workers and the general public will be accomplished in two ways. First, the entire transmitter building and antenna supporting structure will be surrounded with a chain link fence and locked gate to discourage casual public access to the broadcast facilities. Furthermore, to warn the public of possible radio frequency radiation danger, Shepherd Communications, Inc., will mark liberally the area around the facility with warning signs that comply with the ANSI standard C95.2-1982 Radio Frequency Radiation Hazard Warning Symbol.

Second, when maintenance is to be performed on the supporting structure or any of the antennas, operation of the stations will cease until such work has been completed and the workers are no longer on the tower.

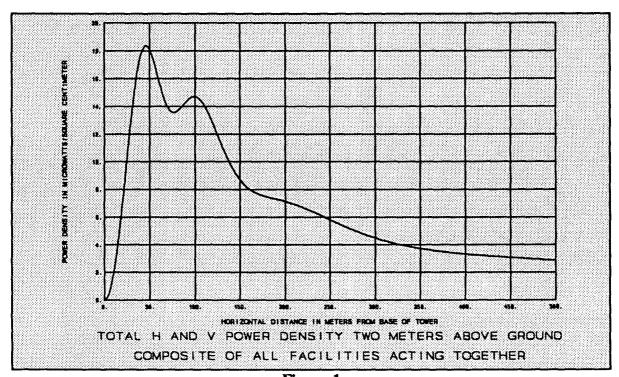


Figure 1

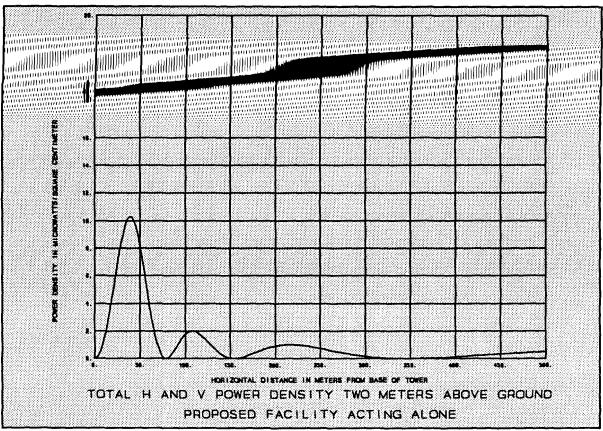


Figure 2

III. CONCLUSIONS

- No underground cable or waveguide is proposed.
- Human exposure to radio frequency radiation will not exceed the maximum level established by the American National Standards Institute (ANSI) based on predictions employing the vertical radiation characteristics of the existing and proposed antennas.
- The property has not been officially designated as wilderness area, nor to the applicant's knowledge is it under consideration for such designation.
- The applicant will comply with environmental requirements of local, state and federal governmental agencies.
- The site is not located in a floodplain.
- The site has not been locally or nationally recognized for its special scenic or recreational value.
- The site is not located in an officially designated wildlife preserve, nor to the applicant's knowledge is it pending consideration for such designation.

- The property is not listed in the National Register of Historic Places, nor to the applicant's knowledge is it eligible for listing.
- The proposed facilities will not affect threatened or endangered species or designated critical habitats as determined by the Secretary of the Interior pursuant to the Endangered Species Act of 1973.
- The proposed facilities will not affect any known Indian religious sites.
- Construction of the proposed facilities will not involve significant changes to surface features.

Therefore, it is concluded that the proposed operation will not significantly affect the quality of the human environment and that an environmental assessment as described in Part 1, Subpart I, of the Commission's Rules is not required. Furthermore, the proposed facility is not classified as having a significant impact upon the environment as defined in §1.1305 and §1.1307 of the Commission's Rules and Regulations.

Lawrence L. Morton, P.E.
Consulting Telecommunications Engineer
December 31, 1992

CERTIFICATE OF SERVICE

I, Denise Sullivan, a secretary in the law firm of Fisher, Wayland, Cooper and Leader, hereby certify that on this 15th day of January, 1993, I served a true copy of the foregoing "Petition of Shepherd Communications, Inc. for Leave to Amend" by first class United States Mail, postage prepaid, upon the following:

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Washington, D.C. 20036

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Denise Sullivan

*By Hand Delivery